

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE TRONOX, INC. SECURITIES
LITIGATION

File No. 09-CV-06220-SAS

**LEAD PLAINTIFFS' NOTICE OF MOTION FOR (I) PRELIMINARY
APPROVAL OF SETTLEMENT, (II) CERTIFICATION OF THE CLASS FOR
PURPOSES OF SETTLEMENT AND (III) APPROVAL OF NOTICE TO THE CLASS**

PLEASE TAKE NOTICE that upon the Stipulation and Agreement of Settlement dated August 3, 2012, attached hereto as Exhibit 1; the accompanying Memorandum of Law; and all other papers and proceedings herein, Lead Plaintiffs LaGrange Capital Partners, LP and LaGrange Capital Partners Offshore Fund, Ltd. will move this Court, under Rule 23 of the Federal Rules of Civil Procedure, at a date, time and location to be set by the Court, for an order: (i) preliminarily approving the proposed Settlement; (ii) certifying the proposed Class and Plaintiffs as Class representatives and appointing Lead Counsel as Class counsel for purposes of the Settlement; (iii) approving the form and manner of giving notice of the proposed Settlement to members of the Class; and (iv) scheduling a hearing on final approval of the Settlement and Lead Counsel's motion for an award of attorneys' fees and reimbursement of Litigation Expenses.

Attached hereto as Exhibit 2 is a copy of the proposed Order Preliminarily Approving Proposed Settlement and Providing for Notice (and its exhibits).

Dated: August 3, 2012

Respectfully submitted,

GOLD BENNETT CERA & SIDENER LLP

By: /s/ Solomon B. Cera
Solomon B. Cera
Thomas C. Bright
595 Market Street, Suite 2300
San Francisco, CA 94105
Telephone: (415) 777-2230
Facsimile: (415) 777-5189

Lead Counsel and Attorneys for Lead Plaintiffs

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

Hannah G. Ross
Laura H. Gundersheim
1285 Avenue of the Americas
New York, New York 10019
Telephone: (212) 554-1400
Facsimile: (212) 554-1444

Attorneys for Named Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on August 3, 2012, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all registered users.

/s/Solomon B. Cera

Solomon B. Cera